

## **MBG MARKETING®**

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December 9, 1997

Dockett Management Branch  
HFA-305  
Food & Drug Administration  
12420 Parklawn Drive  
Room 1-23  
Rockville, MD 20857

Dear Sirs:

I would like to have this letter entered into the official record regarding President Clinton's Food Safety Initiative, specifically in relation to the FDA/USDA's draft version of the Good Agricultural Practices guide.

I represent the Michigan Blueberry Growers Association, also known as MBG Marketing, headquartered in Grand Junction, Michigan. MBG is a producer-owned blueberry marketing, sales and processing cooperative, in operation since 1936. We currently have more than 450 member-owners in Michigan, Indiana, Florida and Georgia. Including marketing contracts, our cooperative represents over 750 blueberry producers in seven states.

I would like to begin by stating our disappointment with the organization of your series of grassroots meetings. It seems nearly futile to have been invited to comment on the draft version of the Good Agricultural Practices guide when we saw it for the first time the day of the meeting. Perhaps it was our misfortune to be included in the first of these town hall meetings. Attendees would have been better prepared to constructively participate had we had the chance to review the draft guide before hand. We strongly support the grassroots effort being exhibited, and believe government, industry and the American public can work together to reach reasonable and practical solutions to issues such as food safety.

MBG works diligently at all levels of the blueberry production system to ensure the safety of our products. Our horticulture department works closely with growers in all aspects of field production, and our operations department guides and monitors all phases of packaging and handling. Following are some of the things

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being done by MBG and its members relative to the areas being addressed by the Good Agricultural Practices guide:

Control of Water – blueberry producers utilize irrigation systems for traditional watering purposes, as well as for frost protection when the crop is at vulnerable stages. The predominant systems used are sprinkler type, overhead irrigation, with deep wells as the primary water source. Fresh market fruit is pre-cooled for shipping in consumer packaging, using forced air. There is no contact with water as with hydro-cooling.

Manure – the practice of manure fertilization is not recommended for blueberries, as they are not physiologically equipped to deal with nitrate forms of nitrogen. Other forms of nitrate fertilization are also not recommended. Blueberries are produced in areas where livestock production is minimal, due to naturally low soil pH, while livestock supporting crops require higher soil pH.

Worker Sanitation and Health – blueberry producers adhere to EPA's 1994 Worker Protection Standards law, which addresses worker safety at some length. This is a difficult area to govern, as it involves controlling human behavior. We would be skeptical of any requirements compelling producers to control the health of workers.

Field and Facility Sanitation – MBG has been very proactive in establishing sound operating procedures within fruit processing facilities (i.e., fruit being packed for the process market). The organization developed, maintains and enforces an internal processing facility handbook that outlines sanitation and safety requirements, as well as providing sanitation schedules. Processing facilities must pass annual in-house audits to qualify for certification, and are subject to spot checks during the season. We also utilize third party (American Institute of Baking) inspections in many facilities. Chlorinated water is utilized on processing lines, with automatic chlorine injection systems required to supply water tanks on these lines. Water in the tanks must be changed every four hours. A chlorinated fresh water source also sprays fruit as it exits processing line water tanks. Well water used in facilities must be tested and certified each year prior to the new processing season. Workers are required to wash their hands after each break and before returning to processing lines. Hand dip chlorine stations are also required. We encourage HACCP programs as a component of comprehensive food safety programs and work with facility operators to establish effective programs.

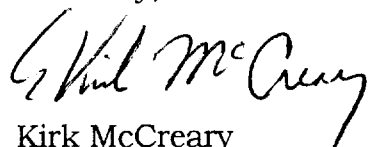
Transportation and Handling – blueberries are transported from field to packing facilities in plastic field lugs. Handlers are encouraged to thoroughly clean and sanitize (through chlorine dipping) these lugs after each use.

Product Traceback – MBG's fresh fruit packaging is stamped with a grower identification number to facilitate source identity in the marketplace. These

numbers allow product to be traced from retail location back to the packer of the fruit. This has been a practical and effective tool in identifying fruit sources. In the area of process fruit, packers code each package with information regarding each particular run. We are currently developing a more precise software program for use in processing facilities to provide for more accurate traceback of product to the grower level.

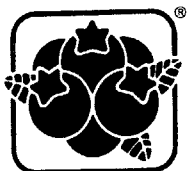
We applaud the initiative to establish a comprehensive guide to help ensure the safety of fresh fruits and vegetables, and certainly prefer this approach to prescriptive regulation. We hope the final version of the guide will contain sufficient flexibility to recognize the tremendous diversity in food production systems, and enough common sense to avoid paralyzing economic constraints. At MBG Marketing, our producers have been committed to good food safety practices since 1936. We clearly recognize our products are consumed by people of all ages, and they rely on us to provide healthy, unadulterated fruit. We view our customers' comfort and safety with the same conviction as our own families'. Consumers provide for our economic well being – the least we must do is provide for the safe stewardship of our food supply.

Sincerely,

A handwritten signature in black ink, reading "Kirk McCreary". The signature is fluid and cursive, with the first name "Kirk" and last name "McCreary" clearly distinguishable.

Kirk McCreary  
General Manager

KM/jc



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